



Plaintiff indicated that he intended to serve written discovery shortly; Defendants' counsel pointed out that the discovery would not be timely given the fact discovery deadline, and the Court encouraged Defendants' counsel to let Plaintiff know promptly after receiving the discovery if Defendants intend not to respond to the discovery on the ground that it was not timely served. The Court reminded Plaintiff that the onus would be on Plaintiff to bring a motion seeking to extend the deadline for fact discovery and to make the requisite showings under Local Rule 16.3. Plaintiff also indicated that he planned to serve deposition notices once he was in a position to pay for the necessary court reporting services. Again, Plaintiff is reminded about the September 30 deadline for the close of all fact discovery.

Finally, Defendants' counsel mentioned that Plaintiff had not yet responded to a draft protective order based on the Court's model protective order. The Court encouraged Plaintiff to review the draft carefully and to let Defendants' counsel know promptly whether the draft is satisfactory and may be filed with the Court, or whether he has specific objections or concerns, and if so, to specify those to Defendants' counsel so that they can be addressed if possible.

s/ Judith M. Kirby

Courtroom Deputy